

United States Department of the Interior

NATIONAL PARK SERVICE

George Washington Memorial Parkway c/o Turkey Run Park McLean, Virginia 22101

IN REPLY REFER TO: 1.A.I (GWMP)

JUL 2 1 2016

Mr. Ben Saunders Electrical Transmission Dominion Virginia Power 120 Tredegar Street Richmond, Virginia 23219

Dear Mr. Saunders:

I am writing regarding Virginia Dominion Power's proposed 230 kV electrical transmission line in Alexandria, Virginia. You have met with members of my staff and other National Park Service (NPS) colleagues over the last several years to discuss this project, and I would like to take this opportunity to comment upon your proposals.

Several of the proposed alternatives for the new electrical transmission line between the Glebe Road Substation and the Potomac River Substation show routes that would cross parkland administered by the NPS as part of the George Washington Memorial Parkway(GWMP). The NPS is authorized under federal law at 54 U.S.C. § 100902 to grant right-of-way permits for electrical transmission facilities. Under NPS policy the issuance of such permits must meet several conditions, including that the permit:

"...may be issued... generally only if there is no practicable alternative to such use of NPS lands." (NPS Management Policies 8.6.4.1)

Since it appears that practicable alternatives exist for the route of this proposed electrical transmission line the NPS does not support the construction of the alternatives that are routed along and/or across the GWMP. More specifically, NPS will not support:

- The two routes which are shown on your drawing entitled "Glebe Substation to Potomac River Substation Preliminary Routing Study September 2014" and are shown as the "Metro / GW Parkway" and "GW Parkway" routes.
- 2. The "Possible Tie-In Route" that crosses the George Washington Memorial Parkway at Slaters Lane. We will only support an underground crossing of the George Washington Memorial Parkway at the existing Norfolk Southern Rail Road crossing of the park.
- 3. The Potomac River underwater route which crosses a portion of the GWMP south of Four Mile Run. We would also like to use this opportunity to emphasize that the underwater portion of this alternative would require a permit from the NPS for use of the Bed of the Potomac River as outlined in the Federal Register at 41 Fed. Reg. 34801.

Accordingly, we believe these proposed routes should be removed from your upcoming filing with the Commonwealth of Virginia State Corporation Commission review for the issuance of a Certificate of Public Convenience and Necessity.

If I can be of any further assistance, please do not hesitate to contact me, or Mr. Peter McCallum of my staff. Mr. McCallum can be reached by email at peter mccallum@nps.gov, or by telephone on 703-419-6435.

Sincerely,

Alexcy Romero Superintendent

cc:

Commonwealth of Virginia State Corporation Commission Division of Energy Regulation P.O. Box 1197 Richmond, Virginia 23218

Mr. William Skrabak
Deputy Director
City of Alexandria
Department of Transportation & Environmental Services
301 King Street
Alexandria, Virginia 22314